

A PROFESSIONAL CORPORATION

76 St. Paul Street P.O. Box 369 Burlington, Vermont 05402-0369

Telephone 802.658.0220 Facsimile 802.658-1456 www.gravelshea.com RECEIVED

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STATE OF VERMONT ATTORNEY GENERAL'S OFFICE

> Hillary A. Borcherding Associate hborcherding@gravelshea.com

February 12, 2021

Vermont Attorney General's Office 109 State Street Montpelier, VT 05609-1001

Re: Public Records Request

Dear Sir or Madam:

I write to request the production of the following public records pursuant to 1 V.S.A. § 315, et seq.

All communications to or from any employees of the Vermont Attorney General's Office ("AGO") and any employees or agents of any of the entities listed below. I further request, any available public records regarding the entities below, including, but not limited to, information regarding the registration status and disciplinary history of these entities or their agents.

- 1. The Eideard Group, LLC
- 2. R&A Capital Management, LLC
- 3. Roberts Asset Management, LLC
- 4. Roberts Asset Mgt., LLC
- 5. G-Form, LLC
- 6. R&A Venture Capital, LLC
- 7. R&A Venture Capital II, LLC
- 8. R&A Venture Capital III, LLC
- 9. BPG Investment Partnership IX, LP
- 10. Eideard Venture Capital I, LLC



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- 11. Eideard Venture Capital II, LLC
- 12. Eideard Venture Capital III, LLC
- 13. Eideard Venture Capital IV, LLC
- 14. Equus Investment Partners X, LP
- 15. Equus Investment Partners XI, LP
- 16. G-Form, LLC
- 17. OhMD, Inc.
- 18. Saturn Partners Limited Partnership III
- 19. Trilantic Energy Partners
- 20. iCapital-TEP Access Fund, L.P.
- 21. Xpress Natural Gas, LLC
- 22. Ronald L. Roberts
- 23. RLR 2013 Irrevocable Trust
- 24. Ronald L. Roberts Revocable Trust 2001
- 25. RTR 2013 Revocable Trust
- 26. John P. Aubin
- 27. Kevin D. Gaboriault
- 28. Eldridge Investors, LLC
- 29. Eldridge Industries, LLC
- 30. SBC Funding II, LLC
- 31. Cool Tech., LLC
- 32. Candy Ventures SARL



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I hereby agree to pay reasonable and customary costs for these copies. Please advise of any such costs before they are invoiced.

If you contend that the law does not allow me to have access to some of these records, please so inform me within three (3) business days, as provided by law, and inform me of the specific exception that applies to each record or portion of a record being withheld. If an otherwise public record has a portion that is exempt from disclosure, please redact the exempt portion and release a copy of the document together with a notation of the specific exemption that applies to the redacted portion.

If some or all of my request is denied, please tell me the title and name of the person responsible for the denial and, as the law requires, please inform me of the appeal procedures available to me and the name of the person to whom appeal may be made.

If possible, we would appreciate you producing responsive documents as multi-page TIFF or PDF files or as single-page TIFF or PDF files with accompanying load files for e-discovery software that includes metadata fields identifying natural document breaks. Please preserve and produce all metadata including: (a) the author(s) of the electronically stored information ("ESI"), (b) the recipient(s) of the ESI, (c) the date the ESI was created, and (d) the source from which the ESI was produced. The "source" of the ESI shall be the name of the person who was the custodian of the ESI or, if the name of a person is not available, the storage location.

If you withhold or redact any documents that are responsive to these requests, please produce a privilege log containing the following information: (a) document date, (b) document author(s) or creator(s), (c) recipient(s), (d) description of subject or content, (e) the source from which the ESI was produced, and (f) the statute or rule under whose authority you have withheld the document.

Please contact me at (802) 658-0220 if you have any questions.

Very truly yours,

fillary A. Borcherding

HAB:kah